

EXHIBIT Q

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Connectu LLC, Cameron Winklevoss,
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and Divya Narendra
9

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF SANTA CLARA
12

13 THE FACEBOOK, INC.

CASE NO. 105 CV 047381

14 Plaintiff,

**RESPONSE OF DEFENDANT DIVYA
NARENDRA TO FIRST SET OF
REQUESTS FOR ADMISSION**

15 v.
16 CONNECTU LLC, CAMERON WINKLEVOSS,
TYLER WINKLEVOSS, HOWARD
17 WINKLEVOSS, DIVYA NARENDRA, AND
DOES 1-25,
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Defendants.
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1 **PROPOUNDING PARTY:** Plaintiff THEFACEBOOK, INC.

2 **RESPONDING PARTY:** Defendant DIVYA NARENDRA

3 **SET NO.:** ONE (1)

4 TO PLAINTIFF AND ITS ATTORNEYS OF RECORD:

5 The above-named party hereby responds, pursuant to California Code of Civil Procedure
6 Section 2033, to the requests for admission as follows:

7 **RESPONSE TO REQUESTS FOR ADMISSIONS**

8 **RESPONSE TO REQUEST NO. 1:**

9 This Request is Denied.

10 **RESPONSE TO REQUEST NO. 2:**

11 Responding party admits visiting FACEBOOK's website but only in his capacity as a
12 member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to
13 Request No. 2.

14 **RESPONSE TO REQUEST NO. 3:**

15 Responding party admits visiting FACEBOOK's website but only in his capacity as a
16 member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to
17 Request No. 3.

18 **RESPONSE TO REQUEST NO. 4:**

19 Responding party admits visiting FACEBOOK's website but only in his capacity as a
20 member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to
21 Request No. 4.

22 **RESPONSE TO REQUEST NO. 5:**

23 Responding party admits visiting FACEBOOK's website but only in his capacity as a
24 member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to
25 Request No. 5.

1 **RESPONSE TO REQUEST NO. 6:**

2 Responding party admits visiting FACEBOOK's website but only in his capacity as a
3 member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to
4 Request No. 6.

5 **RESPONSE TO REQUEST NO. 7:**

6 Responding party admits visiting FACEBOOK's website but only in his capacity as a
7 member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to
8 Request No. 7.

9 **RESPONSE TO REQUEST NO. 8:**

10 Responding party admits visiting FACEBOOK's website but only in his capacity as a
11 member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to
12 Request No. 8.

13 **RESPONSE TO REQUEST NO. 9:**

14 This Request is Denied.

15 **RESPONSE TO REQUEST NO. 10:**

16 This Request is Denied.

17 **RESPONSE TO REQUEST NO. 11:**

18 This Request is Denied.

19 **RESPONSE TO REQUEST NO. 12:**

20 This Request is Denied.

21 **RESPONSE TO REQUEST NO. 13:**

22 This Request is Denied.

23 **RESPONSE TO REQUEST NO. 14:**

24 This Request is Denied.

25 **RESPONSE TO REQUEST NO. 15:**

26 Responding party admits visiting FACEBOOK's website but only in his capacity as a
27 member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to
28 Request No. 15.

1 **RESPONSE TO REQUEST NO. 16:**

2 Responding party admits visiting FACEBOOK's website but only in his capacity as a
3 member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to
4 Request No. 16.

5 **RESPONSE TO REQUEST NO. 17:**

6 Responding party admits visiting FACEBOOK's website but only in his capacity as a
7 member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to
8 Request No. 17.

9 **RESPONSE TO REQUEST NO. 18:**

10 Responding party admits visiting FACEBOOK's website but only in his capacity as a
11 member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to
12 Request No. 18.

13 **RESPONSE TO REQUEST NO. 19:**

14 Responding party admits visiting FACEBOOK's website but only in his capacity as a
15 member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to
16 Request No. 19.

17 **RESPONSE TO REQUEST NO. 20:**

18 Responding party admits visiting FACEBOOK's website but only in his capacity as a
19 member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to
20 Request No. 20.

21 **RESPONSE TO REQUEST NO. 21:**

22 Responding party admits visiting FACEBOOK's website but only in his capacity as a
23 member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to
24 Request No. 21.

25 **RESPONSE TO REQUEST NO. 22:**

26 This Request is Denied.

1 **RESPONSE TO REQUEST NO. 23:**

2 This Request is Denied.

3 **RESPONSE TO REQUEST NO. 24:**

4 Responding party admits visiting FACEBOOK's website but only in his capacity as a
5 member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to
6 Request No. 24.

7 **RESPONSE TO REQUEST NO. 25:**

8 This Request is Denied.

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VERIFICATION

DIVYA NARENDRA, under penalty of perjury under the laws of the State of California,
states as follows:

4 1. That he is one of the Defendants in the above-entitled action;
5 2. That he has read the foregoing RESPONSE OF DEFENDANT DIVYA NARENDRA.
6 TO FIRST SET OF REQUESTS FOR ADMISSIONS and knows the contents thereof, and that the
7 same is true of his own knowledge, save and except as to the matters which are therein stated on his
8 information or belief, and as to those matters, he believes it to be true.

9 Executed on the 31 day of October, 2005, at NY, NY

Divya Narendra
Divya Narendra